Federal Defenders OF NEW YORK, INC.

Southern District 52 Duane Street-10th Floor, New York, NY 10007 Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton Executive Director and Attorney-in-Chief Southern District of New York Jennifer L. Brown Attorney-in-Charge

June 29, 2021

By ECF

Honorable Jesse M. Furman United States District Judge Southern District of New York 40 Foley Square New York, NY 10007

Re: United States v. Marino Ortega, 13 Cr. 814 (JMF)

Honorable Judge Furman:

With the consent of the Government, I write to respectfully request an extension of the schedule for filing a motion for compassionate release. After conferring with the Government, I respectfully request the Defense's motion be due on Friday, July 16, 2021 and the Government's response be due on Friday, July 30, 2021. The parties are working together to secure Mr. Ortega's medical records and other relevant documents from the Bureau of Prisons, and believe the requested schedule will permit those records to be obtained for inclusion in the briefing.

Thank you for considering this request.

Respectfully submitted,

/s/ Christopher Flood Christopher Flood Assistant Federal Defender 212.417.8734

cc: Negar Takeei, AUSA (by ECF)

Application GRANTED. The Clerk of Court is directed to terminate Docket No. 94. SO ORDERED.

June 29, 2021